

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

On the Title V Permit No. V-03-009 R4, Significant Revision

Jim Beam Brands Co.– Booker Noe Distillery

Boston, KY

June 12, 2006

Herbert Campbell, Reviewer

Source I.D. # 21-179-00014

Source A.I. # 3261

Activity I.D. # APE20060002

CURRENT PERMITTING ACTION: V-03-009 R4

Jim Beam Brands Co. (JBB) has applied to the Kentucky Division for Air Quality for a significant revision of the Title V permit No. V-03-009 R3 for its Booker Noe Distillery located in Boston in Nelson County, Kentucky. The facility is proposing an overall source-wide limitation on Hazardous Air Pollutant (HAP) emissions to preclude the Maximum Achievability Control Technology (MACT) applicability of 40 CFR 63.7545(b), National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters. In order to "cap-out" of MACT the facility shall limit source-wide HAPs emissions to less than 9 tons per year for any individual HAP pollutant and 22.5 tons per year for any combination of HAP pollutants. To achieve these limitations of this revision they propose to to achieve the following objectives:

- 1) Cap Hazardous Air Pollutant (HAP), hydrochloric acid emissions (HCl) from the coal-fired boiler to less than 9.0 tons per year (tpy). HCl emissions generated by the coal-fired boiler is the primary source of HAP emission from the facility. As such, the emission limitation on the boiler will keep overall facility-wide emissions below applicable major source thresholds (25 tpy aggregate HAP and 10 tpy individual HAP). Moreover, this emissions limitation will also allow the facility to "cap-out" of the upcoming Maximum Achievable Control Technology (MACT) National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters of Title 40 of the Code of Federal Regulations (40 CFR 63.754(b)).
- 2) Modify the emissions monitoring language for opacity from the baghouse exhaust. As an alternative to the current monitoring requirements, the facility proposes to perform a qualitative visual observation of the opacity of emissions from the coal boiler/baghouse stack on a daily basis and maintain a log of such observations. If visible emissions are seen the permittee shall then assess the opacity of emissions by conducting a formal Reference Method 9 evaluation and initiate an inspection of the control equipment for potential repairs. It is noted that the current monitoring requirement is more stringent than that which was required prior to installation of the baghouse, and thus would appear to be overly restrictive and burdensome.
- 3) Modify the specific control equipment monitoring and maintenance requirement on the baghouse. JBB proposes to replace existing permit language with: "The baghouse shall be operated in such a manner as to maintain compliance with permitted emission limitations in accordance with manufacturer's specifications and /or standard operating practices."

SOURCE DESCRIPTION:

The source is a distillery that makes distilled spirits. Grain is unloaded and conveyed to mills where it is ground. The grain is fed into mash cookers along with water, and the grain starches are converted to sugars by heating. The cooked grain/water mixture is fed into fermenter vessels as a batch operation to convert the sugars to ethanol. After an appropriate residence time, the mixture is processed through distillation columns and condensers. The condensed liquid is fed to spirits tanks and then gauged at the cistern tanks prior to barrel filling. The spent stillage is then dried with a dryer and put into a storage room. Whiskey from the cistern tanks is put into barrels until the appropriate age is reached. The barrels are then gravity dumped, rolled, and rinsed at the dumping station. After dumping, the whiskey is fed to the regauge tanks, where it may be processed and sent to be loaded for shipment.

PUBLIC AND U.S. EPA REVIEW:

On August 4, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Kentucky-Standard* in Bardstown, Kentucky. The public comment period expired 30 days from the date of publication. No comments were received during this period. The permit is now being issued as a proposed permit. The U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division will consider the permit final as conditioned.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.